UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK -----X INTEGRATED MEDIA RESOURCES, LLC, Individually and Derivatively on Behalf of Nominal Defendant G2 FMV, LLC and also Double Derivatively on Behalf of Nominal Defendant G2 INVESTMENT GROUP, LLC, NOTICE OF MOTION TO : **DISMISS PLAINTIFF'S** Plaintiffs, **COMPLAINT** Case No. 21 Civ. 4993 (DLC) : v. JONATHAN TODD MORLEY, DORI V. ORAL ARGUMENT REQUESTED : KARJIAN, DAVID SAMS, JONATHAN LERMAN, ANTONIO DE LA RUA, MARIA BOYAZNY, Defendants, And G2 FMV, LLC, and G2 INVESTMENT GROUP,: LLC, Nominal Defendants.

Defendants David Sams, Jonathan Lerman, and Maria Boyazny, by their counsel Murphy & McGonigle, P.C., respectfully submit this Notice of Motion to Dismiss Plaintiff Integrated

Media Resources, LLC's Complaint and the accompanying Memorandum of Law in Support of their Motion to Dismiss.

Respectfully submitted,

MURPHY & MCGONIGLE, P.C.

By: /s/ Eric A. Bensky
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Attorneys for Defendants David Sams, Jonathan Lerman, and Maria Boyazny

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of August, 2021, I served the foregoing Notice of Motion to Dismiss Plaintiff's Complaint and Memorandum of Law in Support of the Motion to Dismiss Plaintiff's Complaint via ECF on the following:

William Andrew Brewer, III
Attorney for Plaintiff Integrated Media Resources, LLC

Howard Schiffman George Hong Liu Rowe Attorneys for G2 FMV, LLC, G2 Investment Group, LLC, and Jonathan Todd Morley

Dori Karjian *Pro Se Defendant*

/s/ Eric A. Bensky
Eric A. Bensky